

Message

From: Lisa Rector [lrector@nescaum.org]
Sent: 5/14/2020 6:38:00 PM
To: Johnson, Steffan [johnson.steffan@epa.gov]
Subject: RE: test report questions....

Sorry, more questions....this time about quality assurance programs (QAP) 50.333(m):

1. Are QAPs part of the test report? I know they are part of the certification package and I sometimes see them as appendices in test reports.
2. Are the QAPs public documents or do they have protection under CBI?
3. How can the public obtain information about ISO inspections?
4. Does EPA receive results of ISO inspections?
5. If firebox calculations aren't part of the test report, how can a confirmation be made that the unit tested conforms to the comparison be made to the engineering designs and QAP requirements?

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Thursday, May 14, 2020 12:43 PM
To: Toney, Mike <Toney.Mike@epa.gov>; Lisa Rector <lrector@nescaum.org>
Subject: RE: test report questions....

Lisa,

Everyone present should be listed in the report text. There is an example in our GD-43:
<https://www3.epa.gov/ttn/emc/guidlnd/gd-043.pdf>

Although this stops short of a 'requirement', and lists 'key personnel' who I interpret as 'all present'.

The General Provisions of 40 CFR 60.8(f) do list test report requirements but stop short of saying "all personnel". But what I will say is that our opinion is that ANYONE present during a compliance test who interacts with the compliance test program (facility, lab, regulatory agent, consultant, or vendor) must be mentioned in the test report so that the Administrator can ascertain the veracity of the testing and operations of the source during the test.

We are re-working the above linked guideline document and I'll see to it that language similar to the above go into that document.

Stef

From: Toney, Mike <Toney.Mike@epa.gov>
Sent: Thursday, May 14, 2020 11:17 AM
To: Lisa Rector <lrector@nescaum.org>; Johnson, Steffan <johnson.steffan@epa.gov>
Subject: RE: test report questions....

They normally don't but sometime a manuf. rep. does come, and sometimes instructs how to set up heater. If they are there are present they, it would not hurt to state that they are present.

From: Lisa Rector [mailto:lrector@nescaum.org]
Sent: Thursday, May 14, 2020 11:13 AM
To: Toney, Mike <Toney.Mike@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>
Subject: RE: test report questions....

Thanks Mike for the quick response but I am still wondering if the report needs to indicate if a manufacturer representative was present, and if so, should their names be listed. I am used to seeing witness listed in traditional stack test reports.

From: Toney, Mike <Toney.Mike@epa.gov>

Sent: Thursday, May 14, 2020 11:10 AM

To: Lisa Rector <lrector@nescaum.org>; Johnson, Steffan <johnson.steffan@epa.gov>

Subject: RE: test report questions....

The test report should have key personnel who conducted the test on the field data sheets. The manuf. can be present but cannot communicate with lab personnel once the test begins. They can write a note if they see something wrong.

From: Lisa Rector [<mailto:lrector@nescaum.org>]

Sent: Thursday, May 14, 2020 11:06 AM

To: Toney, Mike <Toney.Mike@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>

Subject: test report questions....

Sorry more test report questions. Should the test report list who at the lab conducted the test and if any manufacturer representatives or other interested parties were present?



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